

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

In re:)	Hon. Charles E. Rendlen III
)	Case No. 16-20167-705
RICHARD SCOTT STIGALL and)	
ANDREA LEIGH YOUNGMAN,)	Hearing Date: May 2, 2019
)	Hearing Time: 11:00 a.m.
Debtors.)	Hearing Location: Hannibal

MOTION TO RETAIN PROCEEDS OF SALE OF REAL ESTATE

NOTICE TO INTERESTED PARTIES:

Any response to the following motion must be filed with the Court within 21 days of the date of this notice. Parties represented by an attorney must file their responses electronically according to the procedures prescribed by Court rules for electronic filing. Pro se parties shall mail filings to the United States Bankruptcy Court, Eastern District of Missouri. Responses shall address the merits of the motion and, if applicable, set out actions to remedy the particular problem. The Court will serve such response electronically on the Trustee, debtor's attorney and all other parties to the case who have registered for electronic filing. Respondent shall serve all parties who are not served electronically.

If a response is timely filed, a hearing will be held on a date and time determined indicated above or as otherwise determined by the Court. Notice of such hearing will be provided to all parties in interest. If no response is filed within 21 days, the Court may enter an order without further notice

COME NOW the debtors, by and through counsel, and, in support of this motion, state to the Court, as follows:

1. On April 5, 2019, Debtors filed a Motion to Approve Sale of Real Estate by Debtors (Doc. 74), which Debtors incorporate herein by reference. Said motion has not been ruled upon, and is scheduled to come before the Court on May 2, 2019 on the 11:00 a.m. docket.
2. If the Court approves the sale, Debtors expect to receive a net cash distribution of approximately \$25,662.00, after payoff of the mortgage lien, realtor's commission and incidental closing costs.

3. Debtors have incurred expenses in connection with the repairs and restoration of the property in preparation for the sale, costs associated with moving to their new residence in the state of Oklahoma and extensive dental work required by Debtor Richard Stigall, in the total amount of \$35,840.00. An itemized list of the foregoing receipts and expenses is attached hereto and incorporated herein by reference.

4. Accordingly, Debtors wish to obtain an Order of this Court permitting them to retain the net proceeds of the sale of said real estate,

WHEREFORE, if the Court should grant Debtors' aforesaid Motion to Approve Sale of Real Estate by Debtors, Debtors pray that this Court enter an additional Order authorizing them to retain the net proceeds of the sale, and for such other orders as the Court shall deem meet and just in the premises.

Date: April 24, 2019

BOUL & ASSOCIATES, P.C.

/s/ Harry D. Boul
Harry D. Boul, Mo.Bar #23181
One East Broadway, Suite B
Columbia, MO 65203
Voice Phone: (573) 443-7000
Fax Machine: (573) 449-6554
hboul@earthlink.net

ATTORNEYS FOR DEBTORS
RICHARD SCOTT STIGALL AND
ANDREA LEIGH YOUNGMAN

CERTIFICATE OF SERVICE

I, Cheryl L. Miller, hereby certify that on this 24th day of April, 2019, a copy of the foregoing Notice to Interested Parties and the Motion to Approve Sale of Real Estate by Debtors was served electronically and by regular United States mail to all interested parties, the Trustee, Creditors, and all creditors Agents/Attorneys as listed on the attached list.

April 24, 2019

/s/ Cheryl L. Miller

Cheryl L. Miller

Richard Stigall and Andrea Youngman
Schedule of Extraordinary Expenses
In Support of Motion to Retain Proceeds of Sale of Real Estate

Amount due sellers at closing	161,620
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Deductions:

Mortgage payoff	125,000
Realtor's commission	<u>10,958</u>
Total Deductions	<u>135,958</u>
Net Cash to Sellers	25,662

Extraordinary Expenses Incurred:

Repairs needed to sell Calleo property:	
Replaced damages carpeting	4,000
Replaced rotted deck	7,000
Repairs to master bathroom	5,000
Repairs to kitchen	2,000
Cost of moving to Oklahoma	3,000
Rental deposit on new residence	4,840
Dental work for husband	<u>10,000</u>
Total Extraordinary Expenses	35,840

Richard Scott Stalls
21922 State Highway 7
P.O. Box 63534 - 3308

Label Matrix for local noticing

0865-2

Case 16-20167

Eastern District of Missouri

Hannibal

Tue Jun 21 15:57:09 CDT 2016

Blue Shepherd Investments, LLC

21922 State Highway 7

Callao, MO 63534-3308

Central Bank of Boone County

P.O. Box 678

Columbia, MO 65205-0678

Andrew and Patricia Wynne

1903 Boyd Lane

Columbia, MO 65202-2843

Capital Management Services

726 Exchange # 700

Buffalo, NY 14210-1464

Chariton Valley Telecom

1206 N. Missouri Street

Macon, MO 63552-2150

Bank of America

P.O. Box 851001

Dallas, TX 75285-1001

(P) CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

Chase Bank

Mail Code LA4-5555

700 Kansas Lane

Monroe, LA 71203-4774

Discover Bank

Discover Products Inc

New Albany, OH 43054-3025

MOHEBA/Educational Credit Management Corpora

Educational Credit Management Corp

PO Box 16408

St Paul MN 55116-0408

Monarch Property Management

111 E Broadway #100

Columbia, MO 65203-4208

Penny Mac Loan Services

P.O. Box 514387

Los Angeles, CA 90051-4387

Trustees of Neumayer Equipment Co, Inc.

P.O. Box 55913

Boston, MA 02205-5913

US Department of Education

400 Maryland Ave SW

Washington, DC 20202-0001

Andrea Leigh Youngman

21922 State Highway 7

Callao, MO 63534-3308

United States Attorney

111 South 10th Street

St. Louis MO 63102-1125

Madison, WI 53707-7835

P.O. Box 7835

Write Off Department

US Cellular

1500 E Turner Farm Road

Columbia, MO 65201-9699

Thornton L Youngman

Office of US Trustee

111 S Tenth St, Ste 6.353

St. Louis, MO 63102-1127

Missouri Department of Revenue

PO Box 475

301 W High St

Jefferson City MO 65101-1517

Palatine, IL 60055-0063

Department 0063

Bankruptcy Department

Missouri Credit Union

111 East Broadway

P.O. Box 1795

Columbia, MO 65205-1795

Navant

P.O. Box 9500

Wilkes Barre, PA 18773-9500

Stonegate Mortgage Corp.

Box 619063

Dallas, TX 75261-9063

Kansas City, MO 64106-2607

Room 5510 US Courthouse

400 East 9th Street

US Attorney's Office

P.O. Box 66879

St. Louis, MO 63166-6879

USDA Rural Housing Service